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10 Attorneys for Defendant  
INTUIT INC.

11 UNITED STATES DISTRICT COURT  
12  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

15 IN RE: HIGH-TECH EMPLOYEE  
16 ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

17 THIS DOCUMENT RELATES TO:  
18 ALL ACTIONS

DECLARATION OF INTUIT'S IN-  
HOUSE COUNSEL THOMAS  
HENRY

DECLARATION

I, Thomas Henry, declare as follows:

1. I am Assistant General Counsel at Intuit, Inc. ("Intuit") and have held this position since July 2012. I supervise the litigation of the above-referenced matter, assuming the role held by Lisa Borgeson who is no longer with Intuit. I submit this Declaration regarding Intuit's production of compensation-related materials pursuant to the Court's April 15, 2013 Case Management Order. This Declaration is based on personal knowledge, information obtained from others, and a review of records.

Data

2. After numerous meet and confers, plaintiffs and Intuit agreed to the scope of compensation-related data Intuit would collect and produce. Intuit produced all compensation-related data agreed to by the parties for the discovery period within its possession located after a reasonable search of places likely to have such data, including from four different databases. The data produced included salary, bonus compensation, equity grants, and any available market survey data. Moreover, Intuit answered written questions provided by plaintiffs and produced 30(b)(6) witnesses in June 2012 who testified as to the contents and completeness of this data.

Documents

3. In addition, Intuit believes that it has produced all responsive compensation-related non-data materials within its possession, custody, or control. Pursuant to an agreement with plaintiffs, Intuit collected certain categories of compensation-related materials without the use of search terms, conducting a reasonable and diligent search of pertinent records. Intuit also located additional responsive compensation-related materials by running agreed-upon search terms against the electronically stored information of agreed-upon custodians. In collecting and reviewing these documents, Intuit produced whatever responsive documents it found from the entire discovery period.

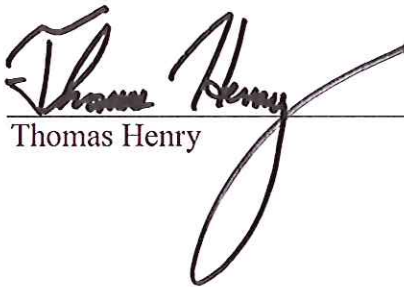
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct. Executed this 25<sup>th</sup> day of April 2013 in Mountain View, California.

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Thomas Henry